

CORRES. CONTROL  
INCOMING LTR NO.

1864 RF 93

DUE  
DATE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

20510

ACTION

DIST

LTR ENC

APR 20 1993

ROCKY FLATS PLANT  
EC&G  
CORRESPONDENCE CONTROL

APR 22 2 44 PM '93

Ref: 8HWM-FF

Mr. Gary Baughman  
Colorado Department of Health  
4300 Cherry Creek Drive South  
Denver, CO 80222-1530

RE: TM #3 - Environmental Evaluation (EE)  
for OU 4, the Solar Ponds

Dear Mr. Baughman:

EPA has completed the review of the Technical Memorandum #3 and feels that the program is adequate for identification of the study area ecosystem and site-related environmental impacts at OU 4. However, EPA suggests that the proposed histopathological investigations be carried out for all the OUs within the Protected area (PA) as a whole rather than for individual OUs. The rationale for this suggestion is explained in more detail in the attached general comments. Since no other major problems were identified with this EE program, EPA recommends approval of this TM assuming DOE adequately addresses the attached comments.

Please do not hesitate to contact Arturo Duran of my staff at (303) 294-1080 with any questions or comments you may have.

Sincerely,

Martin Hestmark, Manager  
Rocky Flats Program

Enclosure

cc: Richard Schassburger, DOE  
Frazer Lockhart, DOE  
Scott Surovchack, DOE  
Ed Lee, EG&G  
Randy Ogg, EG&G  
Joe Schieffelin, CDH  
Harlan Ainscough, CDH  
Arturo Duran, EPA

CORRES CONTROL x x

Reviewed for Addressee  
Corres. Control RFP

4-22-93  
DATE

BY

Ref Ltr. #

ADMIN RECCRD

## 1.0 GENERAL COMMENTS

1. Overall, the EE program presented in this TM appears to be adequate for identification of the study area ecosystem and site-related environmental impacts. However, EPA feels that the program includes some activities that are excessive or inappropriate for the individual OU 4 investigation. Specifically, the proposed **histopathological** investigations for selected organs and tissues should not be carried out for an individual Operable Unit within the Protected Area (PA). It may not be possible to determine whether any histopathological impacts identified resulted from contamination present at OU 4, or from other adjacent OUs within the PA. EPA prefers that these particular investigations be coordinated with all the other OUs within the PA. In this manner, the PA could be studied as a whole rather than breaking it into individual OUs. Therefore, EPA suggests that Ecotoxicological investigations during Stage 2 of this EE program should be limited to the first three tasks mentioned in Section 5.1, Investigative Tasks, page 5-1.

## 2.0 SPECIFIC COMMENTS

1. The text (page 3-3, paragraph 3, and page 3-5) states that use of OU 4 by species of concern is not "excepted." Although this is probably a typographical error, the use of this word raises concern about the meaning of the statements. This should be corrected or clarified.
2. Scientific names provided for species of concern in the text and in Table 4-1 are not consistent. Because both refer to species potentially at RFP, they should be the same or reasons for the discrepancy given.
3. The text states that qualitative methods will be used to assess vegetative cover, yet sample adequacy is associated with quantitative not qualitative methods. The text should be revised to clearly state whether qualitative or quantitative methods will be used.
4. The first step in the chain of logic provided on page 5-19 is a determination of whether target analytes pose a threat to target taxa or prey species. This statement does not correlate with the use of herbivores and vegetation as target taxa. It is possible that predator is meant, but the statement should be clarified.